

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

JAN 15 2020

CLERK U.S. DISTRICT COURT
By: _____
Deputy

UNITED STATES OF AMERICA

v.

No. 4:20-MJ- 022

CURTIS BROWN (01)
KYSTON S. YOUNG (02)

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about January 6, 2020, in the Fort Worth Division of the Northern District of Texas, the defendants, **Curtis Brown** and **Kyston S. Young**, aiding and abetting each other, did intentionally and knowingly by force, violence, and intimidation take from the person and presence of J.T., money belonging to and in the care, custody, control, management and possession of a bank, that is, the Wells Fargo Bank located at 1701 Eastchase Parkway, Fort Worth, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), in violation of 18 U.S.C. § 2113(a) and 18 U.S.C. § 2

Probable Cause:

I, Weldon S. Thompson (your Complainant), further state that I am a detective with the Fort Worth Police Department (FWPD) and I am currently assigned as a Task Force Officer with the Federal Bureau of Investigation (FBI), Fort Worth, Texas. I have been employed as an officer with FWPD since 1991, assigned as a Detective since 2006, and I am currently assigned to investigate violations of 18 U.S.C. § 2113, relating to Bank Robbery. The information contained in this complaint comes from my personal observations, my training and experience, and information obtained from other officers, agents, and witnesses. The facts contained in this complaint are intended to show merely that there is sufficient probable cause for the requested complaint and do not set forth all of my knowledge about this matter. This complaint is based upon the following facts:

1. On or about Monday, January 6, 2020, at approximately 10:20 AM, a black male, hereinafter referred to as robber, entered the Wells Fargo Bank, 1701 Eastchase Parkway, Fort Worth, Texas. The black male was wearing a black zippered hooded jacket with the hood pulled up, he also wore a gray ball cap with an "M" on the front believed to be for the "Mavericks" basketball team. The robber walked up to J.T., the victim teller, and presented a note that read: "This is a robbery do not make this hard I am armed I only want lose bills 100\$, 50\$, 20\$ no Die Packs no tracking you have 3mins do not alert the authorities until I leave."
2. J.T. realized what was happening and stepped back from the window. The robber raised up his jacket, exposing the butt end of a pistol stuck in his pants. J.T. was in fear for herself and others and complied with the robber's demands. J.T. took \$1,960 from her drawer and asked the robber if he wanted an envelope. The robber motioned with his hand to just hand over the money. After getting the money, the robber walked out, leaving the note behind. The robber was last seen on foot leaving the bank. The robber was described as a black male, approximately 5'3" – 5'6", weighing approximately 180–200 pounds.
3. Fort Worth Police arrived and noted that the note was written on a checking/Savings slip from BBVA Compass Bank. Officers noted that there was a BBVA Compass Bank across the street at 1689 Eastchase Parkway. Officers went over and asked if the robber may have been in their bank. A.C., the bank manager at the BBVA Compass, stated that the robber was indeed in the bank about thirty minutes prior and he was with another black male, however they did not rob the bank nor did they have a transaction. The robber was wearing the same clothing, to include the black zippered up hooded jacket and gray ball cap with an "M" on the front. A.C. provided surveillance photographs of both subjects.
4. The Fort Worth Police Department collected the bank robbery note and later processed the note for latent prints. On Tuesday 01/14/2019, Fort Worth Latent Print Examiner, Heather Wigington, developed latent prints from the note. The prints were entered into the Texas Department of Public Safety (DPS), Automated Fingerprint Identification System (AFIS). AFIS identified the following individuals:
 - **Curtis Brown**, B/M 04/07/1994
 - **Kyston Shamar Young** B/M 01/21/2001

5. **Curtis Brown** was determined to have a criminal history for aggravated robbery. Booking photographs from his prior arrests were obtained and determined to closely match the surveillance photographs of the first subject that entered and robbed the Wells Fargo, as well as one of the two that cased the BBVA Compass Bank, on January 6, 2020.
6. **Kyston S. Young** was determined to have a criminal history of Arson. His booking photograph from that prior arrest was obtained, as were photographs from social media. These photographs were determined to closely match the second subject who cased the BBVA Compass Bank on January 6, 2020, just prior to the bank robbery.

As such, based upon the aforementioned facts, I believe there is probable cause to believe that **Curtis Brown** and **Kyston S. Young** committed the offense of Bank Robbery on January 6, 2020, in violation of 18 U.S.C. § 2113(a) and 18 U.S.C. § 2.

01/16/2020
Date

W. Scott Thompson
Detective Weldon S. Thompson
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence on this 16th day of January, 2020, at 1:28 a.m./p.m. in Fort Worth, Texas.

Jeffrey L. Cureton
JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE